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March 16, 2020

**VIA ELECTRONIC FILING**

Hon. Vernon S. Broderick  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: *Recovery Effort Inc. v. Zeichner Ellman & Krause LLP, et al.*,  
No. 19-cv-05641 (VSB)

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Dear Judge Broderick:

We represent Defendants Zeichner Ellman & Krause LLP and Yoav M. Griver in the above-captioned action. We write to request an extension of time, until March 30, 2020, for all Defendants to answer, move, or otherwise respond to the First Amended Complaint. Counsel for Co-Defendants join in this request. Counsel of Plaintiff consents.

On February 20, 2020, Plaintiff Recovery Effort Inc. filed its First Amended Complaint. The current deadline for Defendants to answer, move, or otherwise respond to the First Amended Complaint is March 23, 2020.

As a result of the spread of COVID-19 in New York, my firm has directed that lawyers and staff work from remote locations, resulting in some disruption of work flow. Counsel for the other parties are encountering similar issues. The requested additional time is intended to accommodate this disruption.

Accordingly, the parties respectfully ask that the Court extend the time for all Defendants to answer, move, or otherwise respond to the First Amended Complaint from **March 23, 2020 to March 30, 2020.**

The parties also respectfully request that the corresponding briefing dates on any motions with respect to the First Amended Complaint also be extended by one week so that any opposition papers be due on **May 7, 2020** and any reply papers be due on **May 28, 2020.**

This is the first request for any such extensions.

Respectfully submitted,

/s/Michael T. Sullivan  
Sullivan & Worcester LLP  
Counsel for Zeichner Ellman & Krause LLP  
and Yoav M. Griver

cc: Counsel of Record (via ECF)